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12 Attorneys for Defendants Allied  
13 Solutions, LLC, Ohio Indemnity Company,  
14 and Secure Collateral Management

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 SANDRA GROGAN,

18 Plaintiff,

19 V.

20 ALLIED SOLUTIONS, LLC; OHIO  
21 INDEMNITY COMPANY; SECURE  
22 COLLATERAL MANAGEMENT;  
23 INTOUCH CREDIT UNION; AND  
24 RECOVERY NETWORK OF NEVADA,  
25 INC.

26 Defendants.

27 CASE NO.: 2:24-CV-01669-APG-MDC

28  
**STIPULATION AND ORDER TO**  
**EXTEND DEFENDANTS ALLIED**  
**SOLUTIONS, LLC, OHIO**  
**INDEMNITY COMPANY, SECURE**  
**COLLATERAL MANAGEMENT,**  
**AND RECOVERY NETWORK OF**  
**NEVADA, INC., TIME TO FILE A**  
**RESPONSIVE PLEADING TO**  
**PLAINTIFF'S COMPLAINT**  
**(ECF NO. 1)**

**(FIRST REQUEST)**

29 Plaintiff Sandra Grogan (“Plaintiff”), by and through her counsel of record, George  
30 Haines, Esq., and Gerardo Avalos, Esq., of the law firm Freedom Law Firm, LLC,  
31 Defendants Allied Solutions, LLC (“Allied”), Ohio Indemnity Company (“Ohio”), and  
32 Secure Collateral Management (“Secure”), by and through their counsel of record, Tabetha  
33 J. Steinberg, Esq. and Christian T. Balducci, Esq., of the law firm of Marquis Aurbach, and  
34 Defendant Recovery Network of Nevada, Inc. (“Recovery”), by and through its counsel of

1 record, Jeff Sloane, Esq., of Sloane/Tygret Law Group, hereby jointly agree and stipulate as  
2 follows:

- 3 1. Plaintiff filed her Complaint on September 10, 2024 (ECF No. 1);
- 4 2. Allied, Ohio, Secure, and Recovery's current deadline to respond to Plaintiff's  
5 Complaint is October 11, 2024;
- 6 3. Allied, Ohio, Secure, and Recovery are unable to meet the October 11, 2024,  
7 deadline to file a responsive pleading to Plaintiff's Complaint;
- 8 4. The parties are also discussing potential settlement and resolution of Plaintiff's  
9 claims as alleged in her Complaint;
- 10 5. Plaintiff does not oppose granting Allied, Ohio, Secure, and Recovery an  
11 extension to file a responsive pleading to the Complaint;
- 12 6. Pursuant to LR IA 6-1, Allied, Ohio, Secure, and Recovery request for this Court  
13 to grant an extension of time to file a responsive pleading for thirty (30) days;
- 14 7. The new deadline for Allied, Ohio, Secure, and Recovery to file a responsive  
15 pleading to Plaintiff's Complaint is stipulated and agreed to be November 9,  
16 2024;
- 17 8. This is Allied, Ohio, Secured, and Recovery's first request to extend the deadline  
18 to file a responsive pleading to Plaintiff's Complaint; and
- 19 9. This Stipulation is being made in good faith and not for purposes of delay.

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1           **IT IS SO STIPULATED.**

2           Dated this 11<sup>th</sup> day of October, 2024

Dated this 11<sup>th</sup> day of October, 2024

3           **MARQUIS AURBACH**

**FREEDOM LAW FIRM, LLC**

5           By:/s/ *Christian T. Balducci*

6           Christian T. Balducci, Esq.  
7           Nevada Bar No. 12688  
8           Tabetha Steinberg, Esq.  
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10          10001 Park Run Drive  
11          Las Vegas, Nevada 89145  
12          Attorneys for Defendants Allied  
13          Solutions, LLC, Ohio Indemnity  
14          Company,  
15          and Secure Collateral Management

5           By:/s/ *Gerardo Avalos*

6           George Haines, Esq.  
7           Nevada Bar No. 9411  
8           Gerardo Avalos, Esq.  
9           Nevada Bar No. 15171  
10          8985 South Eastern Avenue  
11          Las Vegas, Nevada 89123  
12          Attorneys for Plaintiff

12          Dated this 11<sup>th</sup> day of October, 2024

13          **SLOANE/TYGRET LAW GROUP**

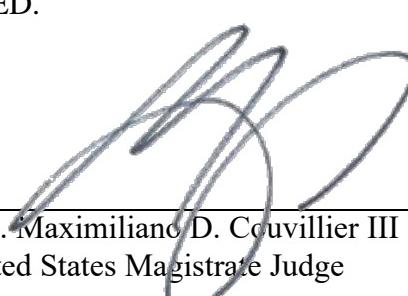
15          By: /s/ *Jeffrey G. Sloane*

16          Jeffrey G. Sloane, Esq.  
17          Nevada Bar No. 784  
18          510 South 8<sup>th</sup> Street  
19          Las Vegas, Nevada 89101  
20          Attorneys for Defendant Recovery Network of  
21          Nevada, Inc.

19           **ORDER**

21          The above Stipulation is hereby GRANTED.

22          IT IS SO ORDERED:

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Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

26           DATED: 10/15/2024